UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JUN 2 2 2016

CERTIFIED MAIL-RETURN RECEIPT REQUESTED
Article Number: 7015 3010 0000 7503 8464

Mr. Ernie Paese, Licensed Operator
Borough of Totowa
100 Riverview Drive
Totowa, New Jersey 07512

Re: **Request for Information ("RFI") Pursuant to Section 308 of the Clean Water Act**
Docket No. CWA-IR-16-019
Sanitary Sewer System Compliance Evaluation Inspection
Borough of Totowa Sanitary Sewer System
NJPDES Tracking ID No. NJP000158

Dear Mr. Paese:

As part of a joint effort between the United States Environmental Protection Agency ("EPA") and the New Jersey Department of Environmental Protection ("NJDEP") to ensure that the discharge of sanitary sewage is minimized, we conducted a Sanitary Sewer System ("SSS") Compliance Evaluation Inspection ("CEI") of the Borough of Totowa system on April 5, 2016. Enclosed is a copy of the CEI report detailing EPA's findings.

The EPA is charged with the protection of human health and the environment under the Clean Water Act ("CWA" or "Act"), 33 U.S.C. §§ 1251 et seq. Section 308(a) of the CWA, 33 U.S.C. § 1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether or not a person/agency is in violation of Section 301 of the CWA, 33 U.S.C. § 1311, the EPA shall require the submission of any information reasonably necessary to make such a determination. Under the authority of Section 308 of the CWA, EPA may require the submission of information necessary to assess the compliance status of any facility and its related appurtenances.

Within **thirty (30) calendar days** of receipt of this RFI, the Borough is hereby required, pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a), to submit to EPA a detailed written summary of the steps the Borough has taken or will take to address each of the **Areas of Concern / Recommendations** detailed in the enclosed CEI Report.

All information required to be submitted by this Request for Information shall be sent by certified mail or its equivalent to the following address:

Doughlas McKenna, Chief
Water Compliance Branch
Division of Enforcement and Compliance Assistance
U.S. Environmental Protection Agency – Region 2
290 Broadway, 20th Floor
New York, NY 10007-1866

Any documents to be submitted by the Borough must be sent by certified mail or its equivalent and shall be signed by an authorized representative of the respective entity (see 40 C.F.R. § 122.22), and shall include the following certification:

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitted false information, including the possibility of fine and imprisonment for knowing violations."

Failure to provide the required information may subject the Borough to civil/criminal penalties pursuant to Section 309 of the CWA. Failure to comply with the RFI shall also subject the facility to ineligibility for participation in work associated with Federal contracts, grants or loans.

Additionally, further guidance and information concerning the control of Sanitary Sewer Overflows ("SSOs") may be found by accessing the following EPA web site: https://www.epa.gov/npdes/sanitary-sewer-overflows-ssos.

If you have any questions, please feel free to contact Ms. Kimberly McEathron, of my staff, at (212) 637-4228 or via email at mceathron.kimberly@epa.gov.

Sincerely yours,

Doughlas McKenna, Chief
Water Compliance Branch

w/enclosures

cc: Marcedius Jameson, NJDEP
John Coiro, Mayor, Borough of Totowa
Melissa Hornsby, NJDEP (Melissa.Hornsby@dep.nj.gov)
Rich Paull, NJDEP (Rich.Paull@dep.nj.gov)
Theophilus Ashie, NJDEP (Theophilus.Ashie@dep.nj.gov)
Bridget McKenna, PVSC (BMcKenna@PVSC.com)

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 [ ] 2 [5]	3 [NJP0001581] 11	12 [160405] 17	18 [&]	19 [R]	20 [1]

Remarks

21 [ ] 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 [010] 69	70 [ ]	71 [ ]	72 [ ]	73 [ ] 74 75 [ ] 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

Borough of Totowa
100 Riverview Drive
Totowa, New Jersey 07512

Entry Time/Date	Permit Effective Date
8:00 AM / 04/05/2016	
Exit Time/Date	**Permit Expiration Date**
1:00 PM / 04/05/2016	

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Ernie Paese, Licensed Operator
Borough of Totowa
100 Riverview Drive
Totowa, New Jersey 07512
Phone: (973) 942-5050

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*

Name, Address of Responsible Official/Title/Phone and Fax Number

Ernie Paese, Licensed Operator
Borough of Totowa
100 Riverview Drive
Totowa, New Jersey 07512
Phone: (973) 942-5050

Contacted: [✓] Yes [ ] No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

[ ] Permit	[ ] Self-Monitoring Program	[ ] Pretreatment	[ ] MS4
[ ] **Records/Reports**	[ ] Compliance Schedules	[ ] Pollution Prevention	
[✓] Facility Site Review	[ ] Laboratory	[ ] Storm Water	
[ ] Effluent/Receiving Waters	[✓] Operations & Maintenance	[ ] Combined Sewer Overflow	
[ ] Flow Measurement	[ ] Sludge Handling/Disposal	[✓] Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes / SEV Description

[ ][ ][ ][ ][ ] _____
[ ][ ][ ][ ][ ] _____
[ ][ ][ ][ ][ ] _____
[ ][ ][ ][ ][ ] _____

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
[signature]	USEPA/DECA-WCB/212-637-4228	6/21/2016
Signature of Management Q A Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
[signature]	**USEPA/DECA-WCB/212-637-3950**	6/21/16

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

- A Performance Audit
- B Compliance Biomonitoring
- C Compliance Evaluation (non-sampling)
- D Diagnostic
- F Pretreatment (Follow-up)
- G Pretreatment (Audit)
- I Industrial User (IU) Inspection
- J Complaints
- M Multimedia
- N Spill
- O Compliance Evaluation (Oversight)
- P Pretreatment Compliance Inspection
- R Reconnaissance
- S Compliance Sampling
- U IU Inspection with Pretreatment Audit
- X Toxics Inspection
- Z Sludge - Biosolids
- # Combined Sewer Overflow-Sampling
- $ Combined Sewer Overflow-Non-Sampling
- + Sanitary Sewer Overflow-Sampling
- & Sanitary Sewer Overflow-Non-Sampling
- \ CAFO-Sampling
- = CAFO-Non-Sampling
- 2 IU Sampling Inspection
- 3 IU Non-Sampling Inspection
- 4 IU Toxics Inspection
- 5 IU Sampling Inspection with Pretreatment
- 6 IU Non-Sampling Inspection with Pretreatment
- 7 IU Toxics with Pretreatment
- ! Pretreatment Compliance (Oversight)
- @ Follow-up (enforcement)
- { Storm Water-Construction-Sampling
- } Storm Water-Construction-Non-Sampling
- : Storm Water-Non-Construction-Sampling
- ~ Storm Water-Non-Construction-Non-Sampling
- < Storm Water-MS4-Sampling
- - Storm Water-MS4-Non-Sampling
- > Storm Water-MS4-Audit

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

- A — State (Contractor)
- B ---- EPA (Contractor)
- E — Corps of Engineers
- J — Joint EPA/State Inspectors—EPA Lead
- L ---- Local Health Department (State)
- N — NEIC Inspectors
- O— Other Inspectors, Federal/EPA (Specify in Remarks columns)
- P— Other Inspectors, State (Specify in Remarks columns)
- R — EPA Regional Inspector
- S — State Inspector
- T — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2, DECA-WCB
20th Floor, 290 Broadway, NY, NY 10007

SANITARY SEWER SYSTEM
COMPLIANCE EVALUATION INSPECTION REPORT

Compliance Evaluation Inspection: Borough of Totowa SSS
Inspection Date: April 5, 2016 **Inspection Time:** 8:00 AM – 1:00 PM
EPA Inspector: Kimberly McEathron, Physical Scientist, USEPA Region 2, (212) 637-4228
Borough Representative: Ernie Paese, Licensed Operator, Department of Sanitary Sewers, Borough of Totowa, (973) 942-5050
Site Information: Borough of Totowa 100 Riverview Drive Totowa, New Jersey 07512 NJPDES Tracking ID No. NJP000158

I. Background and Findings

Collection System:

1. The Passaic Valley Sewerage Commission (PVSC) Wastewater Treatment Plant (WWTP), New Jersey Department of Environmental Protection (NJDEP) New Jersey Pollutant Discharge Elimination System (NJPDES) No. NJ0021016, is a large sized Publicly Owned Treatment Works (POTW).

2. The PVSC WWTP treats separate sanitary sewage from the Borough of Totowa ("Totowa" or "Borough").

3. The PVSC and the Borough have an intermunicipal agreement dated January 7, 1986 regarding the conveyance and treatment of sanitary sewage.

4. The Borough's owned and operated sanitary sewage force main from the Riverview Pump Station connects into the Borough of Woodland Park's owned and operated sanitary sewage force main in Woodland Park which contains sanitary sewage from Totowa, Woodland Park and continues through the City of Paterson into PVSC's interceptor on Curtis Place in Paterson. Immediately adjacent to where sanitary sewage from Woodland Park, Totowa and Little Falls enters the PVSC interceptor is the City of Paterson Curtis Place Combined Sewer Overflow (CSO) outfall (001) (NJPDES No. NJ0105023) which discharges to the Passaic River during overflow events.

5. The Borough and the City of Paterson has two (2) intermunicipal agreements dated December 20, 1972 and January 23, 1989 regarding the connection and conveyance of sanitary sewage from two (2) properties in the Borough. Woodland Park has an intermunicipal agreement with Totowa dated October 10, 1985 regarding the conveyance of sanitary sewage.

6. According to the Borough representative, there are no upstream contributors of sanitary sewage into the Borough's SSS from neighboring municipalities.

7. The North Jersey Developmental Center ("Center") is a New Jersey State owned 155 acre property which consists of a complex of buildings and structures and contributes flow into the Borough's SSS, details are as follows:

   a. According to Borough representatives, the Center was closed approximately six (6) months prior to the EPA inspection (October 2015), meaning that the buildings are no longer occupied and the complex has been abandoned;
   b. According to Borough representatives, the Center was originally constructed as a combined sewer system with an onsite wastewater treatment plant;
   c. When the Center discontinued use of the wastewater treatment plant and connected to the Borough's SSS, the Center agreed to separate the sewers, according to Borough representatives;
   d. However, the Center contributes on average 20,000 gallons per day into the Borough's SSS, indicating inflow and infiltration sources from the abandoned buildings;
   e. Flow is metered by the Borough utilizing a Borough flow meter in a manhole immediately downstream from the Center where it enters the Borough's SSS;
   f. At the time of the inspection, which was conducted during dry weather, the flow meter indicated that flow from the Center was 17.158 gallons per minute;
   g. According to Borough representatives, the Borough continues to bill the State of New Jersey based on the metered flow;
   h. According to Borough representatives, the City of Newark provided the property with drinking water so the condition of the connection is unknown to the Borough;
   i. According to Borough representatives, the Borough has an agreement with the State of New Jersey regarding this property relating to sanitary sewage but was unable to locate it; and
   j. At the time of the EPA inspection, EPA observed a stream on-site with unidentified pipes crossing over the stream and flow in several catch basins and through the connection into the Borough's SSS, indicating infiltration at the time of the dry weather inspection.

8. The total Borough population is approximately 10,000 to 12,000 residents with only approximately four or five houses on septic, according to the Borough representative. According to the Borough representative, the Borough land area is approximately 50-60% residential, 25% industrial and the remaining undeveloped cemeteries.

9. The Borough Sanitary Sewer System (SSS) consists of separate sanitary sewers with approximately 1,000 manholes and 40 miles of sewer piping.

10. According to the Borough representative, the Borough SSS was originally constructed over 100 years ago and approximately 20% is composed of clay.

11. The Borough SSS maps provided at the time of the inspection were original paper maps and blue prints from the 1920's. In addition, the Borough has SSS maps dated September 1978 from a SSES study conducted by Pandullo Quirk Associates but according to the Borough representative, these maps are inaccurate so are not as frequently used as the original paper maps.

12. According to the Borough representative, he (Ernie Paese) is the Licensed Operator of the collection system.

Pump Stations:

13. The Borough operates and maintains seven (7) pump stations in the SSS (Riverview, West End, William Place, Lackawanna, South End, Madison and Hickory).

14. All seven (7) pump stations are equipped with alarm systems which provides notification directly to operations staff in the event of an alarm. Six (6) pump stations are equipped with on-site back up power generators and according to the Borough representative, the Borough is in the process of getting an on-site power generator at the Madison Pump Station, which is the sole pump station without one.

15. The Borough conducts pump station checks twice a day which are documented on a maintenance log.

Flow Metering and Billing:

16. The Borough documents flow utilizing a PVSC owned and operated flow meter located at the Riverview pump station which receives all flow from the Borough. At the time of the inspection, the flow was 1.775 MGD. According to flow records for the Riverview Pump Station, the average flow for the Borough was approximately 2 MGD in 2014 and 2015.

17. The Borough also documents flow coming into the Borough's system as described in paragraph 7 above.

18. PVSC bills the Borough based on metered sanitary sewage flow rates on a quarterly basis.

19. The 1986 intermunicipal agreement between PVSC and the Borough states that "in no event shall the total flow be in excess of an average of 2.4 MGD."

SSO Discharges / Spills:

20. According to Borough documentation, the Borough has experienced one (1) Sanitary Sewer Overflow (SSO) or spill in the past five (5) years within the collection system. On February 2, 2012 from 5:30 pm until 7:00 pm, approximately 800-900 gallons per minute of raw

sewage was bypassed and discharged into the Passaic River from the Riverview Pump Station due to a force main break downstream from the pump station in the Woodland Park operated SSS force main in Paterson, New Jersey.

21. The Borough has a written procedure and a form to be used in response and reporting of sanitary sewer overflows and spills, including a form for documentation.

22. Sanitary sewer system spills and overflows that enter the storm sewer system would ultimately discharge to the Passaic River.

Residential Complaints / Collection System Insurance:

23. According to Borough representatives, the Borough responds to residential complaints regarding sewage backups. According to the Borough's collection system operational report for the month of February 2016, the Borough responded to six (6) lateral blockages and two (2) blockages in the main sewer. According to Borough representatives, responses to residential complaints regarding sewer blockages are documenting in the sewer cleaning report and summarized in the monthly operational reports.

24. According to the Borough representative, the Borough maintains insurance for the collection system.

25. The Borough representatives were unaware of any insurance claims made or paid as a result of SSOs or spills to affected property owners in the past five (5) years.

Collection System Maintenance:

26. The Borough has developed an Operation and Maintenance (O&M) Plan for the collection system, which includes routine maintenance procedures, emergency response, training and pump station maintenance.

27. The Borough adopted Ordinance Chapter 320 Sewers which establishes requirements for grease, oil and sand interceptors. According to Borough representatives, the Borough defers to PVSC when oil and grease issues are identified affecting the collection system.

28. According to Borough representatives, the Borough owns a sewer jet truck for collection system maintenance.

29. The preventative maintenance program developed by the Borough includes pump station inspections twice a day and a sewer jet "hot spot" cleaning schedule. The sewer jet "hot spot" cleaning schedule includes twenty-three (23) locations which are known trouble spots due to grease or a low spot in the sewer line, according to Borough representatives. The locations on this list are listed with monthly slots but according to Borough representatives these locations might not be cleaned every month and are cleaned as needed.

30. According to Borough representatives, monthly operational reports summarizing all events described in N.J.A.C. 7:10A-1.12(b) and the remedial action taken have been sent to PVSC on a monthly basis.

Inflow and Infiltration (I/I):

31. The Borough adopted Ordinance Chapter 320 Sewers which prohibits inflow to the sanitary sewer, including any groundwater, roof runoff and subsurface drainage.

32. In 1984, the then Totowa – West Paterson Sewerage Authority conducted a Sewer System Evaluation Survey (SSES). The report was prepared by PQA Engineering Company, consulting engineers and details the findings and results of rainfall simulation, smoke tests, dye tests and sewer rehabilitation work. The SSES report concludes that the major single contributor of I/I in the Totowa SSS has been lack of joint integrity. The SSES report states that although 1,906 joints were sealed there still remains approximately 16,195 joints to be tested and 6,802 sealed. The SSES report includes costs for the joint rehabilitation work and states that the Totowa – West Paterson Sewerage Authority will assume an initial cost of $593,441 for these repairs but only if the proposed regional system is constructed. Although Totowa subsequently did connect to a regional system, the Borough representatives were unsure if these joint rehabilitation work had been completed as identified because the Authority is no longer an existing entity. In addition, the SSES identified 120 illicit sources of inflow into the SSS through smoke testing. It is unknown if these identified inflow sources have been eliminated.

33. The Borough's contract engineer, Alaimo Group, has been actively applying for and receiving Community Development Block Grant funds to address I/I in the SSS by rehabilitating and lining sewer pipes and manholes. According to Borough representatives, the areas targeted for this program have been sanitary sewers in the worst condition in grant eligible areas, meaning low to moderate income zones. Each of the locations selected are located in the older portion of the SSS where the sewers were constructed of clay pipes. This program currently consists of six (6) phases summarized below:

    a. Phase I was completed in 2013 and included cleaning and cured-in-place lining of 1,820 feet of sanitary sewer on Jefferson Place and Dewey Avenue;
    b. Phases 2 and 3 were completed in 2014 and included cleaning and cured-in-place lining of 685 feet of sanitary sewer on Williams Place and rehabbing three (3) manholes on Elizabeth Place; and
    c. Phases 4 through 6 are in various stages of completion and include an additional cleaning and cured-in-place lining of 1,815 feet of sanitary sewer and associated manhole rehabilitations.

34. According to flow records for January through March 2016, the State of New Jersey owned North Jersey Developmental Center contributed a minimum of approximately 14,159 gallons/day of flow during dry weather on January 24, 2016 up to 238,560 gallons/day of flow during wet weather on February 25, 2016. Because the Center is abandoned, these flows are sources of inflow and infiltration into the Borough's SSS. Based on the average

flow from the Center of 0.05 MGD and the average total sanitary sewage flow of the Borough to PVSC of 2 MGD, approximately 2.5% of the Borough's total sanitary sewage flow can be attributed to this one source of I/I owned by the State of New Jersey. This percentage likely varies during wet weather versus dry weather but this detailed flow information to make a more detailed comparison was not available to EPA at the time of the inspection.

35. According to flow records for the Riverview Pump Station, the average flow for the Borough was 2 MGD in 2014 and 2015. According to flow records, the Borough's peak flow in 2015 was 24.48 MG which occurred during the week ending on March 18, 2015. According to historical rain data, on March 14, 2015 a 0.55 inch rain event occurred.

Municipal Separate Storm Sewer System (MS4):

36. According to Borough representatives, the Borough Department of Public Works operates and maintains the storm sewer system.

Gathered Information:

37. Borough representatives provided EPA with a copy of the following:

    a. SSO documentation dated 5/22/1989, 9/28/1995, 10/2/1995, 1/30/1996, 10/12/2001, 10/15/2001, 11/28/2004, 11/28/2004, and 2/2/2012;
    b. State Home flow daily data and weather conditions for January 2016 through March 2016;
    c. Sewer Department Pump Station Locations list;
    d. Sewer Jet "Hot Spots" Cleaning Sched. 2013 list;
    e. Ordinance Chapter 320. Sewers;
    f. Report On Operation and Maintenance Activities on Municipal Collection Systems for reporting period 2/1/2016 – 2/29/2016;
    g. Community Development Block Grant descriptions, project location maps and costs for Phases 1 through 6; and
    h. Assessment map for the Borough dated February 1973.

II. Summary

Based on the information provided during the SSS CEI, the Borough of Totowa SSS has experienced one (1) sanitary sewer overflow (SSO) in the collection system that resulted in a discharge to a waterbody in the past five (5) years. Despite efforts in the 1980's and in recent years to reduce Inflow and Infiltration (I/I), the Borough of Totowa SSS continues to have sources of inflow and infiltration contributing to increased sanitary sewer flows, based on flow records, see the Areas of Concern / Recommendations section below for more details.

1. AREAS OF CONCERN / RECOMMENDATIONS

a. EPA's inspection identified the following sources of I/I into the Borough's SSS:

i. In 1984, the then Totowa – West Paterson Sewerage Authority Sewer System Evaluation Survey (SSES) report states that although 1,906 joints were sealed there still remains approximately 16,195 joints to be tested and 6,802 sealed. In addition, the SSES identified 120 illicit sources of inflow into the SSS through smoke testing. Borough representatives were unsure if these joint rehabilitation work and the identified illicit connections had been eliminated. The Borough should do the following:
   1. Review the I/I already identified and completed in the SSES report and address any remaining significant sources of infiltration that have yet to be address through the Community Development Block Grant SSS relining program; and
   2. Utilize Ordinance Chapter 320 Sewers to prohibit inflow to the sanitary sewer and utilize enforcement authority to eliminate all illegal connections of inflow to the sanitary sewer system, particularly those that have already been identified.

ii. According to flow records for January through March 2016, the State of New Jersey owned North Jersey Developmental Center contributed a minimum of approximately 14,159 gallons/day of infiltration during dry weather on January 24, 2016 up to 238,560 gallons/day of inflow during wet weather on February 25, 2016. Based on the average flows, approximately 2.5% of the Borough's total sanitary sewage flow can be attributed to this one source of I/I. The Borough should utilize its agreement with the State of New Jersey and/or Ordinance Chapter 320 Sewers to eliminate these sources of I/I into the SSS. The State should be made aware that the inflow from the Center contributes to a decrease of capacity of the sewer system downstream where wet weather discharges to the Passaic River occur from the City of Paterson Curtis Place Combined Sewer Overflow (CSO) outfall (001) (NJPDES No. NJ0105023) during overflow events immediately adjacent to where the Borough's SSS connects into the PVSC interceptor.

iii. At the time of the inspection, the EPA inspector observed a pipe connected to the West End Pump Station from the former WWTP indicating that this flow was a source of infiltration into the SSS. The Borough should eliminate this source of infiltration by simply disconnecting or closing this pipe connection.

b. The Borough appears to be understaffed as the Sanitary Sewer system is being operated and maintained by only one (1) employee in the Sewer Department who then relies on two (2) Department of Public Works employees to assist in addressing backups and blockages in the 40 miles of sewer piping with 1,000 manholes, much of which were constructed over 100 years ago. In addition to conducting preventative and corrective maintenance at seven (7) pump stations and responding to residential complaints.

c. The Borough relies on original paper maps and blue prints from the 1920's which do not incorporate any more recent changes to the SSS. The Borough should consider updating and digitizing maps of the SSS to properly and more effectively operate and maintain the system.

III. Field Work

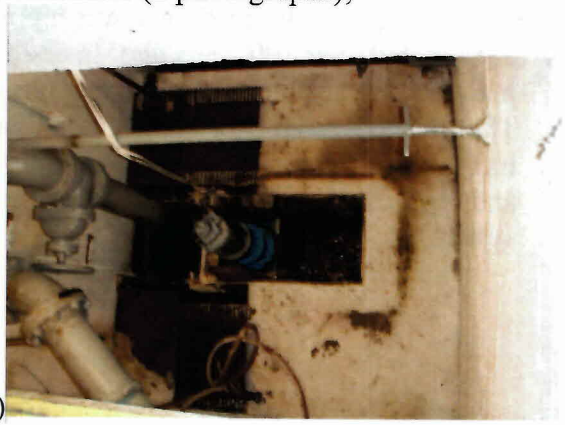
1. Riverview Pump Station a) headworks/influent channel and communitor and b) location of former WWTP tanks (2 photographs);

a)  b) 

2. SSO bypass location at Riverview Pump Station a) manhole overflow point and b) discharge point to Passaic River (2 photographs);

a)  b) 

3. Williams Pump Station a) generator and b) communitor (2 photographs);

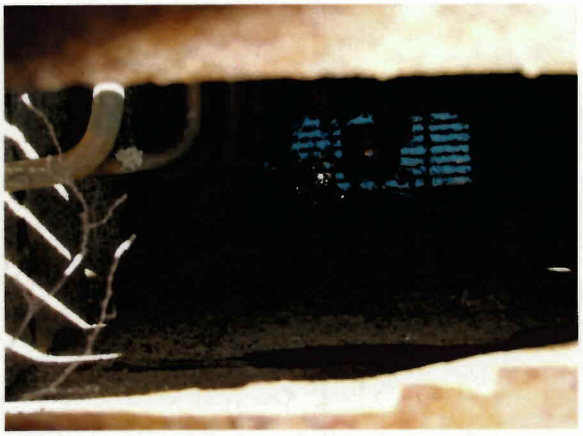
a)  b) 

4. Lined manhole at 82 Elizabeth Place, flow low in channel and no buildup (1 photograph);

5. Dead end manhole on Boyle Avenue at Willow, no flow (1 photograph);

6. New Jersey Development Center a) Borough flow meter and flow in lined manhole, b) standing water in uphill catch basin, c) unidentified pipes crossing stream on-site, d) flow in sanitary manhole on-site;

a)

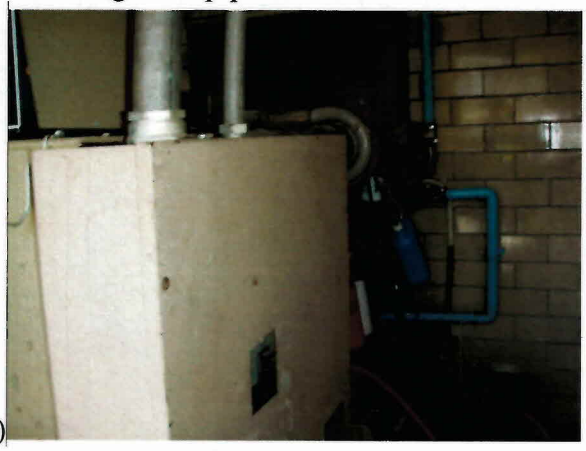


b)

c) 

 d)

7. West End Pump Station a) generator, b) influent chamber and bar screen with infiltration coming from pipe disconnected from former WWTP (2 photographs);

a) 

 b)